

Bartus, Dave

From: Della Fawcett <DFawcett@landauinc.com>
Sent: Thursday, December 10, 2015 7:37 AM
To: Bartus, Dave
Cc: Jay Bower; Jeffrey Fellows
Subject: PCC Structurals Self-Implementing Cleanup - Next Steps
Attachments: F PCBsSampling.pdf; Table 1 - August 2015 PCB Data.pdf; Photo Log.pdf

Dave,

I have attached the figures and tables outlining the results of our August 2015 upland PCB investigation at the PCC LPC site. I have also included a photo log of our sampling, which was overseen by DEQ.

On November 4th, we met with DEQ to discuss a path forward for this investigation. Based on our results, our plan is to continue the work in Area A, B, and C under the supervision of EPA following TSCA requirements. Areas D – H will be managed under the RI and risk assessment for the site, as concentrations in these areas were below 50,000 ug/kg.

Our current plan is to submit another Notice of Self-Implementing Cleanup for Areas A – C following the checklist you provided in the original comment letter. Specifically, for each area we plan to propose the following:

- Area A – Removal of 1-2 feet of soil and encapsulation in accordance with 40 CFR 761.61 (a)(5)(v)
- Area B West – Encapsulation in accordance with 40 CFR 761.61 (a)(5)(v)
- Area B East – Stockpiling of excavated soil for cooling tower construction followed by composite testing of excavation and stockpile
- Area C – No exposed soils or source, continue regular cleaning

Based on the results of the August 2015 upland PCB investigation, please let me know if our proposed next steps are acceptable, or if additional action will be required by EPA. I am available if you would like to discuss our plan prior to sending a formal Notice to your office. We look forward to working with EPA on this project.

Thank you,

Della Fawcett ♦ Senior Project Geologist

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